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November 13, 2001



Dr. William S. Stokes  
Director, NICEATM  
NIEHS  
MD EC-17  
PO Box 12233  
Research Triangle Park, NC 22709

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Dear Dr. Stokes:

On behalf of the American Anti-Vivisection Society (AAVS) and its national membership, I am writing in response to the National Institute of Environmental Health Sciences' (NIEHS) September 28, 2001 *Federal Register* Notice regarding the background review of EPISKIN™, EpiDerm™, and Rat Skin Transcutaneous Electrical Resistance (TER) methods and related recommendations from Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM).

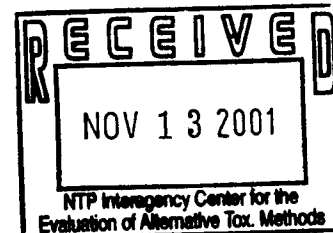
Through independent studies, the European Center for the Validation of Alternative Methods and other European bodies have found these methods to be scientifically valid *replacements* for animal tests intended to distinguish between corrosive and non-corrosive chemicals. Based upon their positive scientific findings, we urge ICCVAM and United States regulatory agencies to immediately accept these *in vitro* methods as *replacements* for animals in the testing of the corrosivity potential of chemicals.

We, however, strongly oppose ICCVAM's recommendation that these *validated* methods be used as part of a "weight of evidence approach in an integrated testing scheme" (NICEATM, page 9) that would require negative findings to be followed up with *non-validated in vivo* testing methods. We urge ICCVAM to accept the use of EPISKIN™, EpiDerm™, and Rat Skin Transcutaneous Electrical Resistance (TER) methods as the only tests required to identify corrosive substances.

Thank you for your consideration of our comments.

Sincerely,

Tina Nelson  
Executive Director



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Ending the use of animals in science through education, advocacy, and the development of alternative methods.

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